

**STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION**

IR 22-076

ELECTRIC DISTRIBUTION UTILITIES

Investigation of Whether Current Tariffs and Programs are Sufficient to Support Demand Response and Electric Vehicle Charging Programs

Final Comments of Until Energy Systems, Inc.

I. Introduction

Unitil Energy Systems, Inc. (“Unitil” or the “Company”) submits these final comments pursuant to the procedural schedule approved by the Commission in the above-captioned docket. These comments are supplemental to previous comments submitted by the Company in this docket. To the extent that the Company has not replied or responded to comments offered by other parties, its silence should not be considered assent or agreement to such comments.

II. Utility-Owned or Funded Electric Vehicle Supply Equipment (“EVSE”)

Over the next several years, New Hampshire has the opportunity to receive and deploy millions of federal dollars from the National Electric Vehicle Infrastructure (“NEVI”) Formula Program as well as funds from the Volkswagen Environmental Mitigation Trust (“VW Settlement”) to help build out the state’s electric vehicle (“EV”) charging infrastructure. To receive its share of the NEVI program funding (\$17 million over 5 years) and deploy VW Settlement funds (\$4.6 million), the State will need to attract and encourage individuals, developers, and businesses to invest in EV charging stations. EV charging infrastructure programs, like Utility Make-Ready Programs, can help attract the private investment New Hampshire needs to successfully take advantage of this outside funding opportunity. In its Final Report, the State’s SB 517 Electric Vehicle Charging Stations Infrastructure Commission recognized that utility owned or funded Make-Ready infrastructure can accelerate charging infrastructure deployment and has the potential “to put downward pressure on rates by spreading fixed costs over a greater volume of electric sales.”¹

It is in the public interest to allow Utilities to implement EVSE Make-Ready Programs and provide new electric service connections for new EV charging service locations as well as the new infrastructure required both in front of and behind the meter to support the acquisition and/or deployment of outside funding for EV charging infrastructure development. Though the Commission declined to adopt the EV Make-Ready infrastructure program proposed by Unitil in DE 21-030 to expand the availability of charging stations in New Hampshire, the Company believes that the time is right for the Commission to revisit the subject of utility-owned or funded

¹ Final Report Electric Vehicle Charging Stations Infrastructure Commission Senate Bill 517, November 1, 2020

EVSE and consider proposals for make-ready programs that will enable the state to maximize available funding opportunities and promote EV traffic and ownership in the state.

III. Curbside Charging & Multi-unit Dwelling (“MUD”) Infrastructure Incentives for Under-Served Communities

As the availability of lower-cost EV models increases, and as a used market for EVs develops, low and moderate income (“LMI”) drivers will have the opportunity to realize the economic benefits that come with the ownership of an EV. However, most EV owners charge at home, which is the cheapest and most convenient location to charge. For many LMI drivers, home charging is often not an option. Many LMI drivers live in MUD housing and may not have a designated parking spot for a charger; may only have on-street parking available; may not be able to afford the installation of a home charger; or cannot obtain permission from landlords to install chargers. If LMI drivers are to share in the financial benefits of EV ownership, widespread and affordable public, MUD, and workplace charging will be essential. However, public charging, especially DC fast charging, is typically more expensive than home charging. This could impose higher transportation costs on those without home charging.

EV adoption is increasing, but the barriers that LMI drivers face for EV adoption are real. Without market intervention it is likely that the EV market will not develop equitably and LMI drivers will miss out on the lower running cost benefits of EV ownership and experience higher transportation costs than those who can charge at home. In addition, LMI communities will not benefit from the air quality improvement EVs can deliver.

Pilot programs that are carefully designed to address the EV adoption barriers that LMI drivers face can help ensure that the EV market develops more equitably. Utilities are uniquely positioned to develop and implement pilots that would stimulate the build out of EV charging in LMI communities, especially public, curbside and MUD housing locations. It is in the public interest to allow Utilities to develop and implement EVSE Charging Pilots that stimulate the development of EV charging in underserved and LMI communities.

IV. EV Managed Charging

In its Final Comments, Eversource encourages the Commission to open a new adjudicative proceeding docket to consider proposals for EV managed charging programs. For the reasons set forth in Eversource’s Final Comments, Unitil agrees that EV managed charging merits consideration by the Commission and supports Eversource’s recommendation.

V. Conclusion

Unitil appreciates the opportunity to provide these Final Comments consistent with the Commission-approved procedural schedule.